

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

JANE DOE 2,)	
)	
Plaintiff,)	Civil Action No. 3: 2023-cv-00582
)	
v.)	
)	
JIMMIE ALLEN, AADYN'S DAD)	JUDGE ALETA A. TRAUGER
TOURING, INC., CHARLES HURD, and)	
JOHN DOES 1-100,)	
)	
)	
Defendants.)	
)	

**PLAINTIFF'S NOTICE OF EXHIBITS TO PLAINTIFF'S MOTION FOR DISMISSAL
OF DEFENDANT JIMMIE ALLEN'S COUNTERCLAIM FOR WANT OF
PROSECUTION OR ALTERNATIVELY FOR AN ORDER PRECLUDING EVIDENCE**

Plaintiff respectfully submits this Notice of Exhibits to Plaintiff's Motion for Dismissal of Defendant Jimmie Allen's Counterclaim for Want of Prosecution or Alternatively for an Order Precluding Evidence (ECF 43).

<u>Exhibit</u>	<u>Description</u>
A	July 19, 2023 Email from Elizabeth A. Fegan Esq. to Defendants' former counsel
B	Plaintiff's First Requests for Production to Defendants dated October 16, 2023
C	Plaintiff's First Sets of Interrogatories to Defendants dated October 16, 2023
D	Plaintiff's Second Set of Requests for Production to Defendant Jimmie Allen dated October 25, 2023
E	February 6, 2024 Email from Elizabeth A. Fegan, Esq. to Alandis Brassel, Esq., et al.
F	February 17, 2024 Email from Alandis Brassel, Esq. to Elizabeth A. Fegan, Esq.
G	March 15, 2024 Email exchange between Elizabeth A. Fegan, Esq. and Alandis Brassel, Esq.

H	April 17, 2024 Email from Elizabeth A. Fegan, Esq. to Alandis Brassel, Esq.
I	April 18, 2024 Email from Alandis Brassel, Esq. to Elizabeth A. Fegan, Esq.
J	April 29, 2024 Email from Alandis Brassel, Esq. to Elizabeth A. Fegan, Esq.
K	June 19, 2024 Email exchange between Elizabeth A. Fegan, Esq. and Alandis Brassel, Esq.
L	Plaintiff's Third Set of Requests for Production to Defendant Jimmie Allen dated June 24, 2024
M	August 1, 2024 Email from Elizabeth A. Fegan, Esq. to Alandis Brassel, Esq.
N	August 3, 2024 Email from Elizabeth A. Fegan, Esq. to Alandis Brassel, Esq.
O	August 19, 2024 Email from Elizabeth A. Fegan, Esq. to Alandis Brassel, Esq.
P	August 21, 2024 Email from Elizabeth A. Fegan, Esq. to Alandis Brassel, Esq.
Q	August 26, 2024 Email exchange between Elizabeth A. Fegan, Esq. and Alandis Brassel, Esq.
R	Defendants Allen and Aadyne's Dad Touring, Inc.'s Initial Disclosures dated October 16, 2023

Dated: August 28, 2024

Counsel for Plaintiff:

/s/ Elizabeth A. Fegan
Elizabeth A. Fegan (admitted *pro hac vice*)
FEGAN SCOTT LLC
150 S. Wacker Drive, 24th Floor
Chicago, IL 60606
(312) 264-0100
beth@feganscott.com

John T. Spragens (BPR # 31445)
SPRAGENS LAW PLC
311 22nd Ave. N.
Nashville, TN 37203
(615) 983-8900
john@spragenslaw.com

CERTIFICATE OF SERVICE

I, Elizabeth A. Fegan, an attorney, caused the foregoing to be filed on August 28, 2024 via the Court's electronic filing system which will serve all counsel of record, including:

Alandis K. Brassel (BPR # 34159)
BRASSEL LAW PLLC
1033 Demonbreun Street, Suite 300
Nashville, TN 37203
(615) 258-8900
alandis@brassel.law

*Counsel for Defendants Jimmie Allen and
Aadyn's Dad Touring, Inc.*

By: /s/ Elizabeth A. Fegan